

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
LYNCHBURG DIVISION**

EMERSON CREEK POTTERY, INC.,	)	
	)	
Plaintiff,	)	
	)	Case No. 6:20-cv-00054
v.	)	
	)	
COUNTRYVIEW POTTERY CO.	)	
EMMERSON CREAK EVENTS, INC.,	)	
CHRISTINA DEMIDUK, and	)	
DAVID DEMIDUK	)	
	)	
Defendants.	)	

**DEFENDANTS' RESPONSES TO PLAINTIFF'S  
2<sup>ND</sup> SUPPLEMENTAL REQUEST TO PRODUCE**

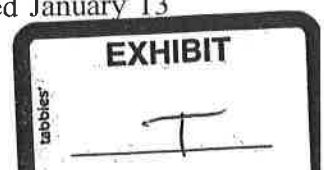
NOW COME Defendants, COUNTRYVIEW POTTERY CO., EMERSON CREEK EVENTS, INC., CHRISTINA DEMIDUK, and DAVID DEMIDUK, by and through their attorneys, LAUBSCHER & LAUBSCHER, PC and LAW OFFICES OF MCLAUGHLIN & ASSOCIATES, P.C., and for their Responses to Plaintiff's 2<sup>nd</sup> Supplemental Request to Produce, state as follows:

**Request No. 30:** All balance sheets for Countryview Pottery Co. and Emerson Creek Events, Inc., kept in the normal course of business, including but not limited to a complete balance sheet for each year for each entity.

**Response:** Defendants object to Request to Produce No. 30 on the grounds that it seeks information not relevant to the issues in this Lawsuit, as it broadly seek disclosure of information related to sales of goods and services apart from the sale of pottery and related goods. Without waiving said objection, this Request was asked and answered in connection with Defendants' Answer to Interrogatory No. 3 and Response to Request to Produce No. 5, both as supplemented and amended June 14, 2019; Defendants' counsel's letter with documents (Response to #s 1-4) dated January 13 2020; and Defendants' counsel's letter dated July 16, 2021, which are incorporated by reference.

**Request No. 31:** All income statements for Countryview Pottery Co. and Emerson Creek Events, Inc., kept in the normal course of business, including but not limited to a complete income statement for each year for each entity.

**Response:** Defendants object to Request to Produce No. 31 on the grounds that it seeks information not relevant to the issues in this Lawsuit, as it broadly seek disclosure of information related to sales of goods and services apart from the sale of pottery and related goods. Without waiving said objection, this Request was asked and answered in connection with Defendants' Answer to Interrogatory No. 3 and Response to Request to Produce No. 5, both as supplemented and amended June 14, 2019; Defendants' counsel's letter with documents (Response to #s 1-4) dated January 13



2020; and Defendants' counsel's letter dated July 16, 2021, which are incorporated by reference.

**Request No. 32:** All cash flow statements for Countryview Pottery Co. and Emerson Creek Events, Inc., kept in the normal course of business, including but not limited to a complete cash flow statement for each year for each entity.

**Response:** Defendants object to Request to Produce No. 31 on the grounds that it seeks information not relevant to the issues in this Lawsuit, as it broadly seek disclosure of information related to sales of goods and services apart from the sale of pottery and related goods. Without waiving said objection, this Request was asked and answered in connection with Defendants' Answer to Interrogatory No. 3 and Response to Request to Produce No. 5, both as supplemented and amended June 14, 2019; Defendants' counsel's letter with documents (Response to #s 1-4) dated January 13 2020; and Defendants' counsel's letter dated July 16, 2021, which are incorporated by reference.

**Request No. 33:** A chart of accounts for each year for each entity.

**Response:** Defendants object to Request to Produce No. 31 on the grounds that it seeks information not relevant to the issues in this Lawsuit, as it broadly seek disclosure of information related to sales of goods and services apart from the sale of pottery and related goods. Without waiving said objection, no such chart of accounts exists.

**Dated: July 21, 2021**

Respectfully submitted,

/l/ljr/

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**CERTIFICATE OF SERVICE**

The undersigned, an attorney, hereby certifies that on July 21, 2021, he served a copy of the above-referenced Defendants' Responses to Plaintiff's 2<sup>nd</sup> Supplemental Request to Produce upon:

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Admitted *pro hac vice*